

September 9, 2004

Mr. Stephen A. Byrne
Senior Vice President, Nuclear Operations
South Carolina Electric & Gas Company
Virgil C. Summer Nuclear Station
Post Office Box 88
Jenkinsville, South Carolina 29065

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION REGARDING BULLETIN 2003-01,
"POTENTIAL IMPACT OF DEBRIS BLOCKAGE ON EMERGENCY SUMP
RECIRCULATION AT PRESSURIZED-WATER REACTORS" (TAC NO. MB9617)

Dear Mr. Byrne:

By letter dated August 8, 2003, South Carolina Electric and Gas Company (the licensee/SCE&G) provided the 60-day response to NRC Bulletin 2003-01 for the Virgil C. Summer Nuclear Station (VCSNS). The Bulletin requested SCE&G to either (1) state that the emergency core cooling system (ECCS) and containment spray system (CSS) recirculation functions have been analyzed with respect to the potentially adverse post-accident debris blockage effects identified in the Bulletin and are in compliance with all existing applicable regulatory requirements, or (2) describe any interim compensatory measures that have been implemented or that will be implemented to reduce the interim risk associated with potentially degraded or nonconforming ECCS and CSS recirculation functions until an evaluation to determine compliance is complete.

The Nuclear Regulatory Commission staff has completed its preliminary review of your response and has determined it needs additional information to complete our review. The enclosed request for additional information contains specific questions related to these issues. I have discussed this request with Mr. Robert Sweet, Licensing Supervisor, VCSNS, and he agreed to respond to this request by October 5, 2004. Please contact me if you have any questions.

Sincerely,

/RA/

Karen R. Cotton, Project Manager, Section 1
Project Directorate II
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket No. 50-395

Enclosure: As stated

cc w/encl: See next page

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REQUEST FOR ADDITIONAL INFORMATION

VIRGIL C. SUMMER NUCLEAR STATION

BULLETIN 200301, "POTENTIAL IMPACT OF DEBRIS BLOCKAGE ON
EMERGENCY SUMP RECIRCULATION AT PRESSURIZED WATER REACTORS"

By letter dated August 8, 2003, South Carolina Electric and Gas Company (the licensee/SCE&G) provided the 60-day response to NRC Bulletin 2003-01 for the Virgil C. Summer Nuclear Station (VCSNS). The Bulletin requested SCE&G to either (1) state that the emergency core cooling system (ECCS) and containment spray system (CSS) recirculation functions have been analyzed with respect to the potentially adverse post-accident debris blockage effects identified in the Bulletin and are in compliance with all existing applicable regulatory requirements, or (2) describe any interim compensatory measures that have been implemented or that will be implemented to reduce the interim risk associated with potentially degraded or nonconforming ECCS and CSS recirculation functions until an evaluation to determine compliance is complete. The NRC staff has completed its preliminary review of your response and has determined it needs the following additional information to complete our review:

1. On page 7 of Attachment 1 of your Bulletin 2003-01 response, you discuss an ongoing effort to update Plant Support Engineering Guideline 08 for Technical Support Center System Engineers, to include a response to sump clogging. However, your response does not completely discuss the guideline update to be developed, nor does it provide a schedule for its completion. Please provide a schedule for this effort, a detailed discussion of the guideline changes with respect to operator-identified instances of sump clogging, and the response actions the operators would be instructed to take in the event of sump clogging and loss of ECCS recirculation capability.
2. On page 8 of Attachment 1 of your Bulletin 2003-01 response, you state that "a change to VCSNS EOPs based on overall risk improvement cannot be justified without appropriate industry review of the issue." On page 9 of Attachment 1 of your Bulletin 2003-01 response, you state, "if the generic [owners group] guidance is approved and issued, VCSNS will determine if the implementation is appropriate for an overall risk reduction." The Westinghouse Owners Group (WOG) has developed operational guidance in response to Bulletin 2003-01 for Westinghouse and CE-type pressurized water reactors. Please provide a discussion of your plans to consider implementing this new WOG guidance. Include a discussion of the WOG-recommended compensatory measures that have been or will be implemented at your plant, and the evaluations or analyses performed to determine which of the WOG-recommended changes are acceptable at your plant. Provide technical justification for those WOG-recommended compensatory measures not being implemented by your plant. Also, include a detailed discussion of the procedures being modified, the operator training being implemented, and your schedule for implementing these compensatory measures.

ENCLOSURE

3. NRC Bulletin 2003-01 provides possible interim compensatory measures licensees could consider to reduce risks associated with sump clogging. In addition to those compensatory measures listed in Bulletin 2003-01, licensees may also consider implementing unique or plant-specific compensatory measures, as applicable. Please discuss any possible unique or plant-specific compensatory measures you considered for implementation at your plant. Include a basis for rejecting any of these additional considered measures.

Mr. Stephen A. Byrne
South Carolina Electric & Gas Company

VIRGIL C. SUMMER NUCLEAR STATION

cc:

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